

JOSEPH P. RUSSONIELLO (CSBN 44332)
United States Attorney
JOANN M. SWANSON (CSBN 88143)
Chief, Civil Division
MELANIE L. PROCTOR (CSBN 228971)
Melanie.Proctor@usdoj.gov
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6730
FAX: (415) 436-7169

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LAN ZHOU SOBHI,

Plaintiff,

v.

MICHAEL CHERTOFF, Secretary of the
Department of Homeland Security; EMILIO
T. GONZALEZ, Director of the Citizenship
and Immigration Services; DONALD
NEUFELD, Director of the California
Service Center of USCIS; ROBERT S.
MUELLER III, Director of the Federal
Bureau of Investigation,

Defendants.

No. C 07-06245 MEJ

JOINT REQUEST FOR EXEMPTION
FROM THE FORMAL ADR PROCESS;
PROPOSED ORDER

Each of the undersigned certifies that he or she has read either the handbook entitled "Dispute Resolution Procedures in the Northern District of California," or the specified portions of the ADR Unit's Internet site <www.adr.cand.uscourts.gov>, discussed the available dispute resolution options provided by the court and private entities, and considered whether this case might benefit from any of them.

Here, the parties agree that referral to a formal ADR process will not be beneficial because this mandamus action is limited to Plaintiff's request that this Court compel Defendants to adjudicate an application for naturalization. Given the substance of the action and the lack of any

1 potential middle ground, ADR will only serve to multiply the proceedings and unnecessarily tax
2 court resources. Accordingly, pursuant to ADR L.R. 3-3(c), the parties request the case be removed
3 from the ADR Multi-Option Program and that they be excused from participating in the ADR phone
4 conference and any further formal ADR process.

5 Dated: February 27, 2008

Respectfully submitted,

6 JOSEPH P. RUSSONIELLO
7 United States Attorney

8 /s/
9 MELANIE PROCTOR¹
10 Assistant United States Attorney
11 Attorneys for Defendants

12 Dated: February 27, 2008

13 /s/
14 BOBBY GLEN BELL, Jr.
15 Epstein, Surowitz, & Bell
16 Attorney for Plaintiff

17 **ORDER**

18 Pursuant to stipulation, IT IS SO ORDERED.

19 Date: March 6, 2008



28 ¹I, Melanie L. Proctor, hereby attest that I have on file all holograph signatures for any
signatures indicated by a “conformed” signature (/S/) within this efiled document.